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IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH

RUSSELL GREER

Plaintiff

v.

JOSHUA MOON ET AL,

Defendants

PLAINTIFF'S RESPONSE TO ECF 317

Case No.: 2:24-cv-00421-DBB-JCB

I. INTRODUCTION

Plaintiff appreciates that defendants are proving that they are indeed "the web's biggest community of stalkers." As stated in his complaint, defendants screenshot everything and post it onto kiwi farms. It is very creepy, yet they for some reason think they are the normal ones.

What defendants are doing is looking on from the outside and once again accusing plaintiff of lying and fraud, when he has done neither.

Plaintiff will further elaborate on what he has been saying.

1. 2020 Wages

Plaintiff was making \$16.00 an hour, a mere two dollars more then he is now, in September 2020. Greer knew he was getting ready to move to Las Vegas, which he did so in December 2020. So Greer had to pay not just fees to move and to save up for a deposit and rent at his Vegas apartment he was moving to (\$2,000), but also paying Utah rent, utilities (\$1200), a car (\$500), bills, etc. Greer had to file before the statute of limitations for the copyright infringement claim of his book expired. Greer knew IPF was available and looked into it and felt given his circumstances, he would qualify. Greer shared all of this in his IPF application.

2. Relying on Case Law

Contrary to defendants' false accusations, plaintiff doesn't just file things for the thrill of it, he researches. Greer was relying on case law that said a person isn't required to give away their entire monies they have on them to file a case. Further, the decision to "grant or deny in forma pauperis status under § 1915 lies within the sound discretion of the trial court." *Cabrera v. Horgas*, 1999 WL 241783 at *1 (10th Cir. 1999). It's the truth that Greer didn't have a lot of money on him and that he was using money to move. Greer told the court that. The Court chose to grant IPF.

3. Pandemic money paid for audition and AGT lawsuit

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Not done with trying to insult Greer's integrity, and proving how much theses insanely creepy individuals stalk him, defendants point to Facebook posts from December 2020 taking about hiring musicians.

There's a few things wrong with their "gotcha":

- 1. The December 2020 pandemic stimulus check went to the audition. **EXHIBIT A.**
- Since Greer had moved to Las Vegas by then, he was able to use money, as he had Ben done moving.
- 3. The March 2021 stimulus check went to the AGT lawsuit, which was filed in August.
- **4.** Plaintiff is unsure why defendants are still protesting this and investigating. They got his IPF status revoked and this is turning into litigation harassment.

CONCLUSION

Defendants need to stop pointing their fingers insulting at plaintiff. He did nothing wrong. These false accusations only prove that defendants have no case. None of their filings have had anything to do with copyright.

Respectfully submitted,

Russell Greer

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5-24-25

CERTIFICATE OF SERVICE:
Pursuant to FRCP 5(b), I certify that on 5-27-25, I served a true and correct copy of the attached document by ECF to all attorneys on record.

EXHIBIT A: stimulus check schedule

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Document 318





dependents, like a relative).

NOTE: If you did not receive an Economic Impact Payment in 2020 or 2021, or you have questions about the payments, please visit the Internal Revenue Service for more information.

How much was paid in each of the three rounds?

Round 1, March 2020: **\$1,200** per income tax filer, \$500 per child (CARES Act)

Round 2, December 2020: **\$600** per income tax filer, \$600 per child (Consolidated Appropriations Act, 2021)

Round 3, March 2021: \$1,400 per income tax filer, \$1,400 per child (American Rescue Plan Act)

